



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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April 9, 2020

VIA ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Troy Steinbergin v. City of New York, et al.,
19 CV 01314 (JMF)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and represent defendants City of New York, Detective Jamal Hairston, Undercover Officer 39 and Undercover Officer 76 in the above-referenced action. I write with plaintiff's counsel's consent to respectfully request a two week extension to serve and file a summary judgment motion from Monday April 13, 2020 until Monday, April 27, 2020. This is defendants' first request for an extension to file the motion for summary judgment.

The reason for the request is that Undercover Officer 39's transcript has not yet been produced to counsel in this matter, and that transcript is necessary for use in citations in the motion. Plaintiff's counsel has not advised as to when he expects to receive Undercover Officer 39's transcript, and thus be able to produce it. However, I note that Undercover Officer 39 was deposed on March 10, 2020, and thus, it is likely that his deposition transcript will be available within the next two weeks. Plaintiff's counsel has advised that he will promptly produce the transcript, once he receives it. Should the Court grant defendants' request, it will affect deadlines set forth by the Court for motion practice in the Court's Order dated February 28, 2020. Counsel thus requests that, should the Court grant defendants' request, all deadlines related to motion practice be extended by two weeks.

Thank you for your consideration herein.

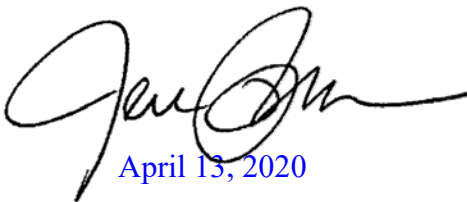
Respectfully submitted,

/s/

Lucienne Pierre, Esq.

cc: Samuel DePaola, Esq. (via ECF)
Plaintiff's Counsel

Application GRANTED. Defendants shall file any motion for summary judgment no later than **April 27, 2020**. If Plaintiff files a cross-motion for summary judgment, any brief in support of such a motion and in opposition to Defendants' motion shall be filed no later than **May 18, 2020**. Defendants' opposition to Plaintiff's cross-motion and reply brief in support of its motion shall be filed no later than **June 8, 2020**. Plaintiff's reply in support of its cross motion shall be filed no later than **June 15, 2020**. If Plaintiff does not file a cross-motion for summary judgment, Defendants shall file their reply in support of their motion no later than **May 25, 2020**. The Clerk of Court is directed to terminate ECF No. 45. SO ORDERED.



April 13, 2020